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8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$9,000.00 IN
U.S. CURRENCY, AND

15 APPROXIMATELY \$7,200.00 IN
16 U.S. CURRENCY,

17 Defendants.
18

2:20-MC-00075 KJM DB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

19 It is hereby stipulated by and between the United States of America and potential claimant Charles
20 Isles (“claimant”), appearing *in propria persona*, as follows:

21 1. On or about January 14, 2020, claimant filed a claim in the administrative forfeiture
22 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$9,000.00 in U.S.
23 Currency and Approximately \$7,200.00 in U.S. Currency (hereafter “defendant currency”), which were
24 seized on October 25, 2019.

25 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required
26 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a
27 claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has
28 filed a claim to the defendant currency as required by law in the administrative forfeiture proceeding.

1 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
2 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency
3 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture
4 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.
5 That deadline was April 13, 2020.

6 4. By Stipulation and Order filed April 7, 2020, the parties stipulated to extend to July 10,
7 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
8 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
9 forfeiture.

10 5. By Stipulation and Order filed July 10, 2020, the parties stipulated to extend to August 10,
11 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
12 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
13 forfeiture.

14 6. By Stipulation and Order filed August 10, 2020, the parties stipulated to extend to
15 September 9, 2020, the time in which the United States is required to file a civil complaint for forfeiture
16 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
17 to forfeiture.

18 7. By Stipulation and Order filed September 15, 2020, the parties stipulated to extend to
19 October 9, 2020, the time in which the United States is required to file a civil complaint for forfeiture
20 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject
21 to forfeiture.

22 8. By Stipulation and Order filed October 8, 2020, the parties stipulated to extend to November
23 9, 2020, the time in which the United States is required to file a civil complaint for forfeiture against the
24 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
25 forfeiture.

26 9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend to
27 December 9, 2020, the time in which the United States is required to file a civil complaint for forfeiture
28 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject

1 to forfeiture.

2 10. Accordingly, the parties agree that the deadline by which the United States shall be required
3 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that
4 the defendant currency is subject to forfeiture shall be extended to December 9, 2020.

5 Dated: 11/6/2020

McGREGOR W. SCOTT
United States Attorney

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7 By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

8
9 Dated: 11/6/2020

/s/ Charles Isles
CHARLES ISLES
Potential Claimant
Appearing *in propria persona*
(Signature authorized by phone)

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12 **IT IS SO ORDERED.**

13 Dated: November 13, 2020.

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16 CHIEF UNITED STATES DISTRICT JUDGE